STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION





Pineland Farms Potato Company, Inc. Aroostook County Mars Hill, Maine A-911-71-G-M Departmental
Findings of Fact and Order
Air Emission License
Minor Revision #2

FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

- 1. Pineland Farms Potato Company, Inc. (Pineland) was issued Air Emission License A-911-71-D-R on February 18, 2011, permitting the operation of emission sources associated with their potato processing facility. The license was subsequently amended on April 9, 2013 (A-911-71-F-M).
- 2. Pineland has requested a minor revision to their license to construct a 32,000 square foot addition to their facility to provide storage space and additional peeling capacity. This addition will increase fuel consumption and emissions by less than 5%; as this amount is easily accommodated by the facility's present fuel and emissions limits, no increase in either is sought.
- 3. The equipment addressed in this license is located at 115 Presque Isle Road, Mars Hill, Maine.

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B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

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<u>Equipment</u>	Maximum Capacity (MMBtu/hr)	Maximum <u>Firing Rate</u>	Fuel Type, <u>% sulfur</u>	Stack #
Boiler #1	8.37	60 gal/hr	#2 fuel oil, 0.5% S	1
Boiler #2	20.4	146 gal/hr 19,805 scf/hr	#2 fuel oil, 0.5% natural gas, negl.	2

C. Application Classification

This amendment will increase emissions by less than 4 tons per year for each single pollutant and less than 8 tons per year for all pollutants combined. Therefore, this modification is determined to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

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B. Boilers #1 and #2

Boiler #1 is an 8.37 MMBtu/hr (Million British thermal units per hour) unit, firing #2 fuel oil at a rate of 60 gallons per hour. The boiler was manufactured and installed in 1996, and because of its maximum heat input rate, it is not subject to the New Source Performance 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. The boiler exhausts through its own stack.

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Boiler #2 is a 20.4 MMBtu/hr unit firing #2 fuel oil at a rate of 146 gallons per hour, and is capable for firing natural gas at a rate of 19,805 standard cubic feet per hour (scf/hr). Because of its maximum heat input rate, Boiler #2 is subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. The boiler exhausts through its own stack.

C. Peeler

Pineland currently operates a steam peeler with a maximum raw material process rate of 80,000 pounds per hour.

D. <u>Description of Expansion Project</u>

Pineland is planning a building expansion project which will add approximately 32,000 square feet of storage to the plant. No new emission equipment is being added, however, the number of hours the currently licensed equipment will be operated will increase, thus increasing fuel use and emissions by approximately 5%. The anticipated increase in fuel use and emissions can be easily accommodated by Pineland's current fuel use and emissions limits, therefore no increase in either is sought in connection with this project.

E. Annual Fuel Limit

Pineland is currently limited to an annual heat input of 219,900 MMBtu/year based on a heating value of 0.14 MMBtu/gal for #2 fuel oil and 0.00103 MMBtu/scf (Million British thermal unit per standard cubic foot) of natural gas. Compliance shall be demonstrated by records of fuel use for each fuel, kept on a monthly and a 12-month rolling total basis.

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F. Annual Emissions

Pineland shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on firing 1,571,000 gallons per year of #2 fuel oil.

Total Licensed Annual Emissions for the Facility Tons per year

(used to calculate the annual license fee)

	<u>PM</u>	<u>PM₁₀</u>	SO ₂	NO _x	<u>CO</u>	<u>voc</u>
Boilers	8.8	8.8	55.4	33.0	3.9	0.2
Total TPY	8.8	8.8	55.4	33.0	3.9	0.2

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

<u>Pollutant</u>	Tons/Year		
PM_{10}	25		
SO_2	50		
NO _x	50		
CO	250		

The total annual licensed emissions for the facility are above at least one of the emission levels contained in the table above; however, after taking into consideration the following factors:

- similarity with other licensed sources based on size, emissions, and local topography;
- location, including proximity to other sources, complex terrain and Class I areas; and
- background air quality data available in or representative of the local area.

The Department has determined that an ambient air quality impact analysis is not required for the facility and that Ambient Air Quality Standards (AAQS) will not be exceeded.

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ORDER

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Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources:

The Department hereby grants Air Emission License A-911-71-G-M subject to the conditions found in Air Emission License A-911-71-D-R, A-911-71-E-T, and A-911-71-F-M and in the following conditions.

<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following Special Condition (22) shall be added to A-911-71-D-R:

(22) The addition of 32,000 square feet of space to the plant is approved.

DONE AND DATED IN AUGUSTA, MAINE THIS 28 DAY OF August , 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-911-71-D-R.

Date of initial receipt of application: 05/05/2014 Date of application acceptance: 05/05/2014

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, Bureau of Air Quality.

Filed

AUG 28 2014

State of Maine Board of Environmental Protection